

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re

STANADYNE LLC, *et al.*<sup>1</sup>

Debtors.

Chapter 11

Case No. 23-10207 (TMH)  
(Jointly Administered)

Re: Docket Nos. 561, 614

**CERTIFICATION OF COUNSEL REGARDING ORDER GRANTING MOTION OF  
THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS FOR AN ORDER  
(I) APPROVING ON AN INTERIM BASIS THE ADEQUACY OF DISCLOSURES IN  
THE COMBINED DISCLOSURE STATEMENT AND PLAN OF LIQUIDATION,  
(II) SCHEDULING THE CONFIRMATION HEARING AND DEADLINE FOR FILING  
OBJECTIONS, (III) ESTABLISHING PROCEDURES FOR SOLICITATION AND  
TABULATION OF VOTES TO ACCEPT OR REJECT THE COMBINED PLAN AND  
DISCLOSURE STATEMENT, AND APPROVING THE FORM OF BALLOT AND  
SOLICITATION PACKAGE, AND (IV) APPROVING THE NOTICE PROVISIONS**

I, Jeffery R. Waxman, hereby certify as follows:

1. On September 8, 2023, the Official Committee of Unsecured Creditors (the “Committee”) for the above-captioned debtors and debtors in possession filed the *Motion of the Official Committee of Unsecured Creditors for an Order (I) Approving on an Interim Basis the Adequacy of Disclosures in the Combined Disclosure Statement and Plan of Liquidation, (II) Scheduling the Confirmation Hearing and Deadline for Filing Objections, (III) Establishing Procedures for Solicitation and Tabulation of Votes to Accept or Reject the Combined Plan and Disclosure Statement, and Approving the Form of Ballot and Solicitation Package, and (IV) Approving the Notice Provisions* (the “Motion”) [Docket No. 561] with the United States Bankruptcy Court for the District of Delaware (the “Court”).

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<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number are: Stanadyne LLC (0378); Pure Power Technologies, Inc. (5202); Stanadyne PPT Holdings, Inc. (2594); and Stanadyne PPT Group Holdings, Inc. (1734). The Debtors’ headquarters are located at 405 White Street, Jacksonville, North Carolina 28546.

2. Originally, as set forth in the Court's *Order Granting Motion of the Official Committee of Unsecured Creditors for an Order (I) Approving on an Interim Basis the Adequacy of Disclosures in the Combined Disclosure Statement and Plan of Liquidation, (II) Scheduling the Confirmation Hearing and Deadline for Filing Objections, (III) Establishing Procedures for Solicitation and Tabulation of Votes to Accept or Reject the Combined Plan and Disclosure Statement, and Approving the Form of Ballot and Solicitation Package, and (IV) Approving the Notice Provisions* (the "Solicitation Order") [Docket No. 614], the confirmation hearing was scheduled for November 9, 2023, and the deadline to file a Confirmation Brief and Supporting Evidence and Respond to Objections to the Plan was set for November 5, 2023. At the Court's direction, the confirmation hearing was rescheduled for November 21, 2023 at 10:00 a.m.

3. The Committee, together with Cerberus, is working with the United States Trustee to resolve certain confirmation issues and has agreed to extend the plan objection deadline through and including November 7, 2023. In light of the rescheduled hearing and the extended deadline, the Committee requests that the deadline in the Solicitation Order be extended until November 14, 2023, for parties to submit briefs and other documents in support of confirmation and file a proposed confirmation order.

4. An amended solicitation order (the "Amended Order") extending the deadlines is attached hereto as **Exhibit A**. The undersigned counsel has conferred with the United States Trustee and Cerberus, neither of which opposes the entry of the rescheduled deadline.

5. The undersigned counsel is available should the Court have any concerns with

respect to the foregoing, and respectfully requests that the Court enter the proposed Amended Order at its earliest convenience.

Dated: November 1, 2023

**MORRIS JAMES LLP**

/s/ Jeffrey R. Waxman

Jeffrey R. Waxman (DE Bar No. 4152)  
500 Delaware Avenue, Suite 1500  
Wilmington, DE 19801  
Telephone: (302) 888-6800  
Facsimile: (302) 571-1750  
E-mail: jwaxman@morrisjames.com

*Counsel to the Official Committee of  
Unsecured Creditors*